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April 14, 2022

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court for the Southern  
District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

Re: Nextdoor, Inc.’s Letter Motion to File Exhibits Under Seal - 420 Taylor Ventures, LLC, et al. v. Nextdoor, Inc., Case No. 1:22-mc-00105-KPF

Dear Judge Failla:

Pursuant to Rule 9 of Your Honor’s Individual Rules of Practice in Civil Cases, Respondent Nextdoor, Inc. submits this letter in support of its motion for leave to file under seal Exhibits G & H of the Declaration of Dakota S. Speas, filed in opposition to the motion to quash filed by 420 Taylor Ventures, LLC, NT 420 Taylor Owner LLC, NH 420 Taylor Owner LLC, 420 Taylor Holdings Owner LLC, and Seven Equity Group, LLC (collectively, “Movants”).

“It is clear that the courts of this country recognize a general right to inspect and copy public records and documents.” *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 597 (1978). “It is uncontested, however, that the right to inspect and copy judicial records is not absolute.” *Id.* at 598. For example, courts may restrict access to “sources of business information that might harm a litigant’s competitive standing.” *Id.*

Movants have designated Exhibit G “Highly Confidential – AEO” and Exhibit H “Confidential” pursuant to the terms of the Protective Order in effect in *Nextdoor, Inc. v. 420 Taylor Ventures, LLC, et al.*, 3:21-cv-03341-EMC, a case currently pending in the United States District Court for the Northern District of California, where the subpoena at issue in Movants’ motion was issued. ECF 1-2. Under the terms of the Protective Order (Paragraph 12.3), documents produced in discovery designated “Confidential” or “Highly Confidential – AEO” may not be filed in the public record without consent from the designating party. While Nextdoor takes no position on the propriety of sealing these documents, which were produced

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and designated by Movants, in compliance with the Protective Order, Nextdoor hereby moves to file them under seal.

For the foregoing reasons, Nextdoor respectfully requests leave to file under seal Exhibits G & H to the Declaration of Dakota S. Speas filed in opposition to Movants' motion to quash.

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Ian Weiss

Ian Weiss

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*Attorneys for Respondent Nextdoor, Inc.*

Application GRANTED. Respondent shall be permitted to file the above-specified documents under seal. The Clerk of Court is directed to terminate the pending motion at docket entry 5.

Dated: April 15, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE